



147 WEST 25TH STREET, 12TH FLOOR
NEW YORK, NEW YORK 10001
CHAUDHRYLAW.COM

June 11, 2024

Via ECF

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Application GRANTED. The initial pretrial conference currently scheduled for June 26, 2024 is hereby ADJOURNED to **August 28, 2024, at 9:00 a.m.** Plaintiff shall file a status update regarding service of process no later than **August 14, 2024**. The Clerk is directed to terminate ECF No. 18.

SO ORDERED.

**Re: Taurus Bartlett, p/k/a "Polo G" v. J. Noah B.V. and Jozef Wanno,
Case No. 23-CV-10345 (JMF)**

A handwritten signature in black ink, appearing to read 'Jeffrey M. Movit', is written over the text 'SO ORDERED.' and the date 'June 14, 2024'.

June 14, 2024

Dear Judge Furman:

We are counsel for Plaintiff Taurus Bartlett, professionally known as "Polo G."

We write pursuant to the Court's Order dated April 19, 2024 (ECF No. 17) to provide "a status update regarding [Plaintiff's] efforts to effect service on Defendants" We further write to respectfully request an adjournment of the initial pretrial conference that is presently scheduled for June 26, 2024, as well as an adjournment of the concomitant deadline to file a joint letter and a Civil Case Management Plan and Scheduling Order.

Although we have proceeded with diligence, service of process has not yet been completed upon Defendants J. Noah B.V. and Jozef Wanno (the "Defendants"); for this reason, Plaintiff requests an adjournment of the initial pretrial conference.¹ As this Court has been apprised, Defendants are based in the Netherlands and refused to accept service of process. Accordingly, we promptly engaged a vendor, ABC Legal Services, Inc., to serve the Defendants with process in the Netherlands via the Hague Convention. As explained in the annexed Declaration of Sophia Mailhos dated June 11, 2024, we have been told that the Central Authority in the Netherlands received and acknowledged our request for service of process. *Id.* We are now waiting for the service documents to be returned to the Central Authority by the Dutch bailiff. *Id.* ABC Legal informed our office on June 3, 2024 that "it wouldn't be unusual [for it]

¹ If granted, this request would not affect any other deadlines in this action. This is our third request for an extension of this deadline. Our prior requests (which were made on the same ground that service of process has not yet been completed) was granted by the Court. As Defendants have not yet been served with process, they are not in a position to consent or object to this request.

JUNE 11, 2024

PAGE 2 OF 2

to take [a] couple of more months before we receive anything back from” the authorities in the Netherlands. *Id.*

We remain hopeful that service of process will be completed through the Hague Convention. However, if we are unable to do so, we intend to move the Court to authorize an alternative form of service on Defendants. *See Jian Zhang v. Baidu.com Inc.*, 293 F.R.D. 508 (S.D.N.Y. 2013) (Furman, J.) (authorizing a Chinese defendant to be served through its United States counsel pursuant to Fed. R. Civ. P. 4(f)(3)).

We appreciate the Court’s consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jeffrey M. Movit', written over a horizontal line.

Jeffrey M. Movit

cc: Jozef Wanno, an individual defendant and the principal of defendant J. Noah B.V.
(Via Email)